

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

RICHARD A. GORMAN,

Plaintiff,

-against-

ILYA SHPETRIK,

Defendant.

Civil Action No. 2:20-cv-04759-JCJ

**DECLARATION OF MATTHEW  
J. PRESS**

I, MATTHEW J. PRESS, declare under penalty of perjury that the following is true and correct, to my personal knowledge:


1. I am counsel to Defendant Illya Shpetrik and am familiar with the facts set forth herein. I submit this declaration in support of Defendant's motion to dismiss the Complaint.

2. A true and correct copy of Plaintiffs' Complaint in this matter, along with Exhibits 1-12 to the Complaint, is attached hereto as **Exhibit 1**.

3. A true and correct copy of the Responses to Interrogatories Nos. 1 & 4 by John C. Monarch in *Richard A. Gorman v. John C. Monarch, et al.*, Eastern District of Pennsylvania, Civ. Action No. 14-0890, is attached hereto as **Exhibit 2**.

4. A true and correct copy of a Facebook chat produced in discovery in *Richard A. Gorman v. John C. Monarch, et al.*, Eastern District of Pennsylvania, Civ. Action No. 14-0890, is attached hereto as **Exhibit 3**.

5. A true and correct copy of excerpts of the deposition of Richard A. Gorman in *Richard A. Gorman v. John C. Monarch, et al.*, Eastern District of Pennsylvania, Civ. Action No. 14-0890, is attached hereto as **Exhibit 4**.



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Matthew J. Press